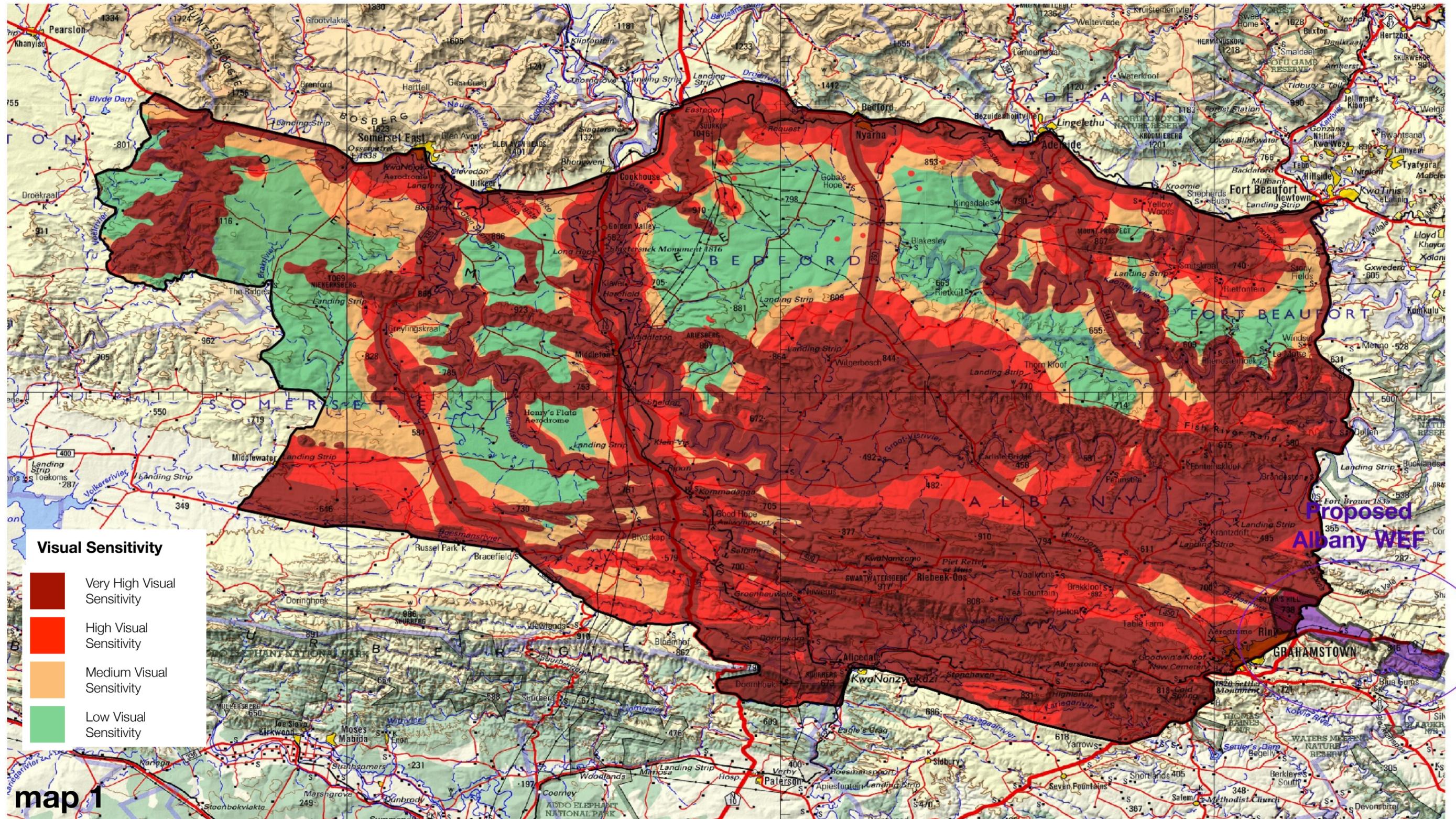


source : Wind and Solar PV Strategic Environmental Assessment, Cookhouse REDZ 3, CSIR 2015.

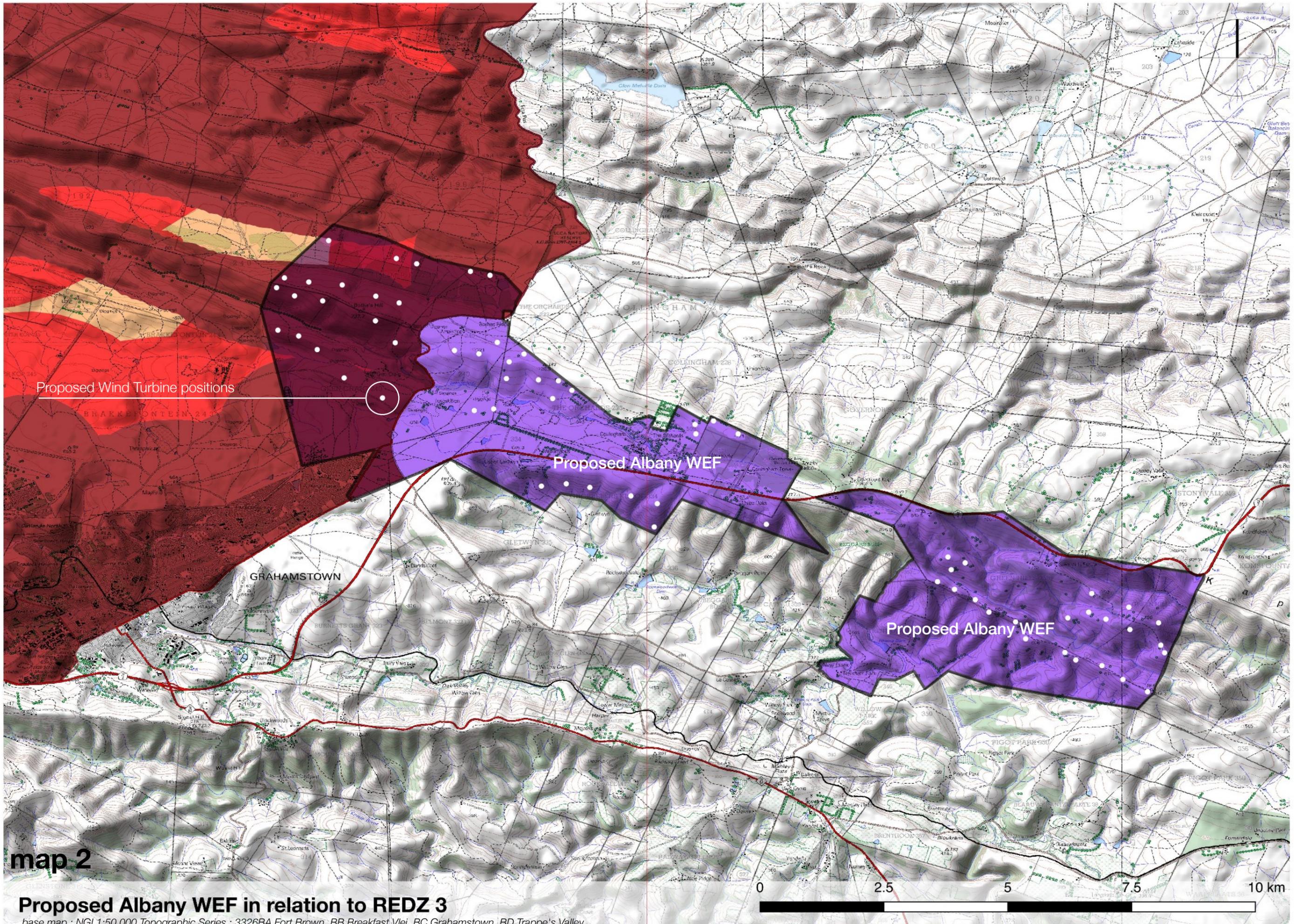


map 1

REDZ 3 • COOKHOUSE : Visual Sensitivity

base map : NGI 1:250 000 Topo-cadastral Series : 3326 Grahamstown





Proposed Wind Turbine positions

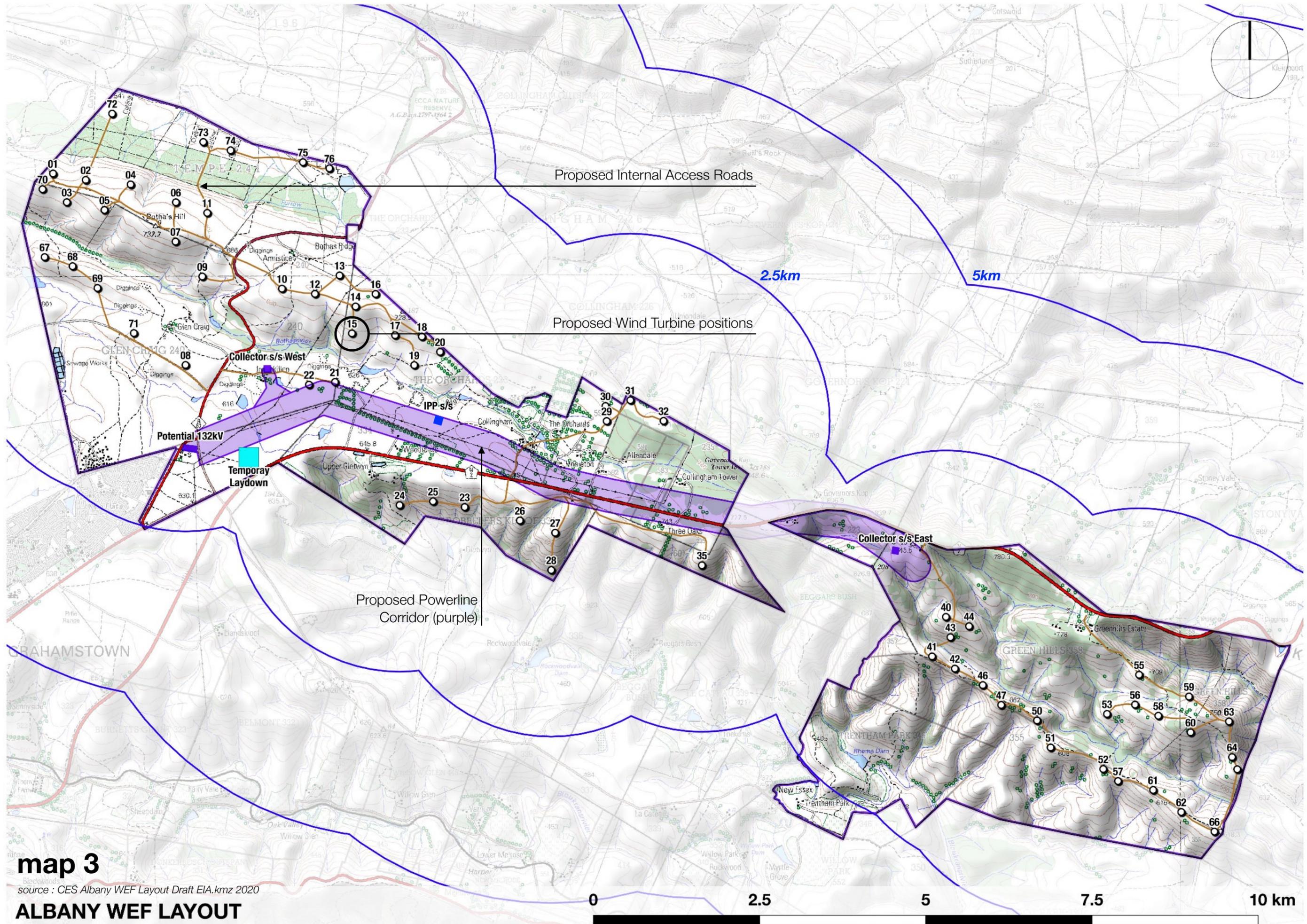
Proposed Albany WEF

Proposed Albany WEF

map 2

Proposed Albany WEF in relation to REDZ 3

base map : NGI 1:50 000 Topographic Series : 3326BA Fort Brown, BB Breakfast Vlei, BC Grahamstown, BD Trappe's Valley

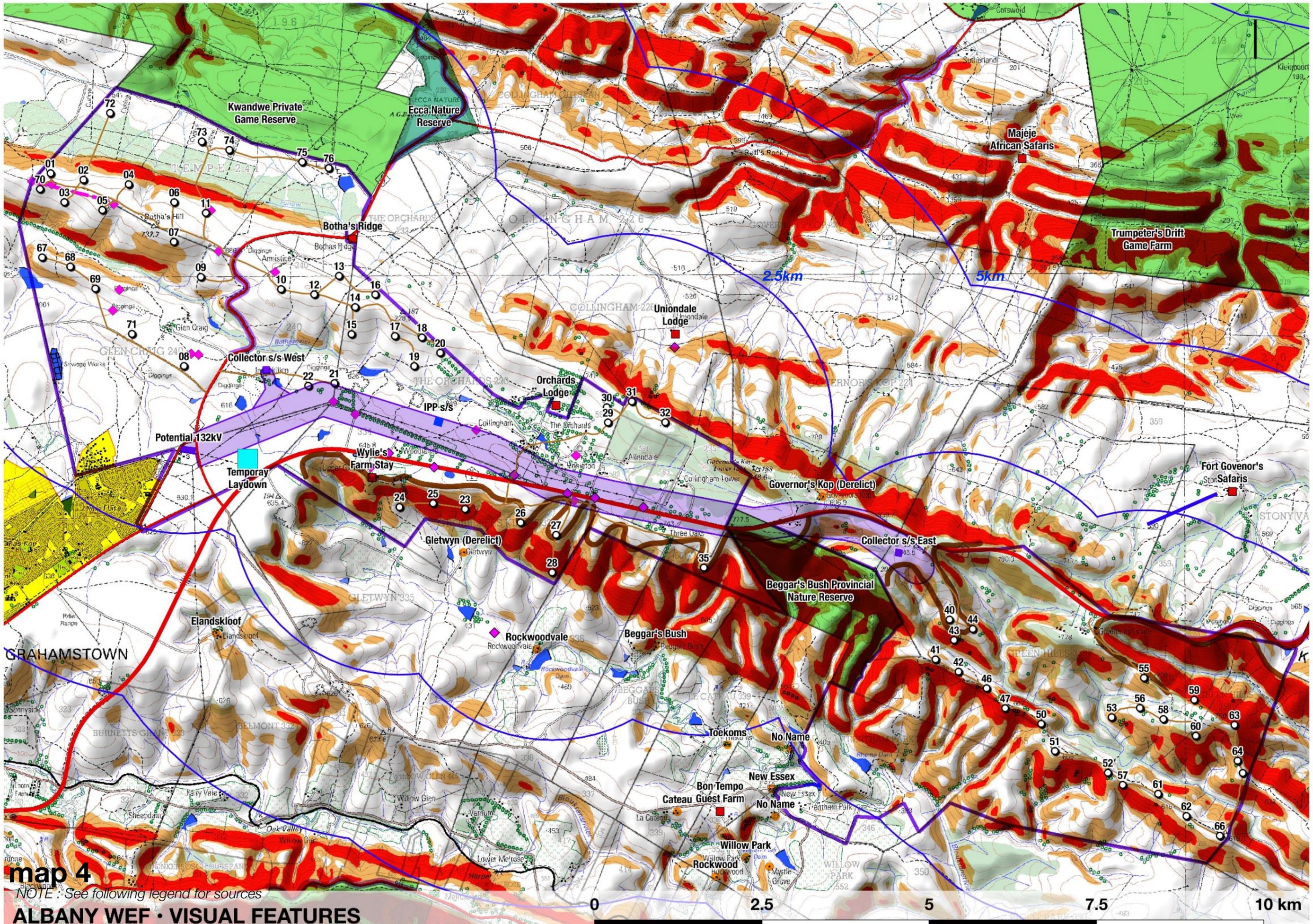


map 3

source : CES Albany WEF Layout Draft EIA.kmz 2020

ALBANY WEF LAYOUT

base map : NGI 1:50 000 Topographic Series : 3326BA Fort Brown, BB Breakfast Vlei, BC Grahamstown, BD Trappe's Valley



map 4

NOTE : See following legend for sources

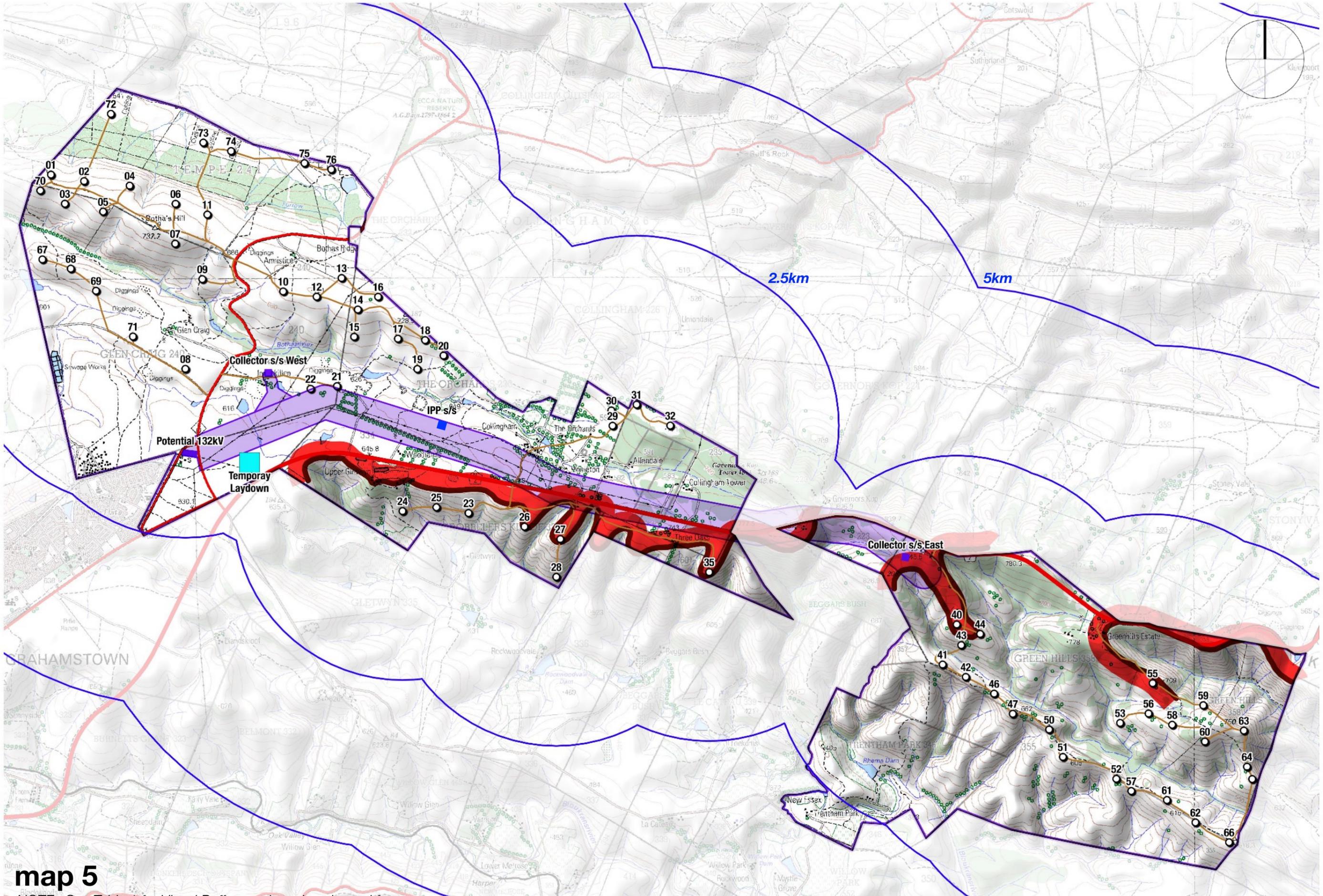
ALBANY WEF • VISUAL FEATURES

base map : NGI 1:50 000 Topographic Series : 3326BA Fort Brown, BB Breakfast Vlei, BC Grahamstown, BD Trappe's Valley

Visual Features Legend :

Source :

	Topographic Features, Ridge-lines	<i>derived from 1:50 000 NGI Topographic Series</i>
	1:4+ Slopes (red) 1:10 - 1:4 Slopes (orange)	<i>derived from NGI 5m contour data</i>
	Water Features, Farm Dams	<i>SANBI NFEPA Wetlands data 2017</i>
	Heritage Sites Grade I, II and III	<i>SAHRA Heritage Site Inventory Dec 2017 Phase 1 Archaeological Impact Assessment: Proposed Albany WEF, C. Booth Jan 2020</i>
	Nature Reserves, Protected Areas	<i>DEFF SAPAD Database OR Q4 2019</i>
	Private Reserves, Game Farms	<i>SANBI Private Reserves, Game Farms, Conservancies 2018</i>
	Guest Farms, Game Farm Lodges	<i>derived from Google Earth Aerial imagery Dec 2018, Google Map Data 2020</i>
	Settlements, Towns	<i>derived from Google Earth Aerial imagery Dec 2018</i>
	Farmsteads	<i>derived from Google Earth Aerial imagery Dec 2018, 1:50 000 NGI Topographic Series</i>
	Arterial Routes	<i>Open Street Map Roads Categorized Data 2019</i>
	Scenic Routes	<i>interpreted from Open Street Map Roads Data 2019, Google Earth Aerial and Street View Imagery 2014/2018, 1:50 000 NGI Topographic Series</i>
	National Road	<i>Open Street Map Roads Categorized Data 2019</i>
	Small Airfields	<i>CAA Database 2018, Google Earth Aerial Imagery Dec 2018</i>

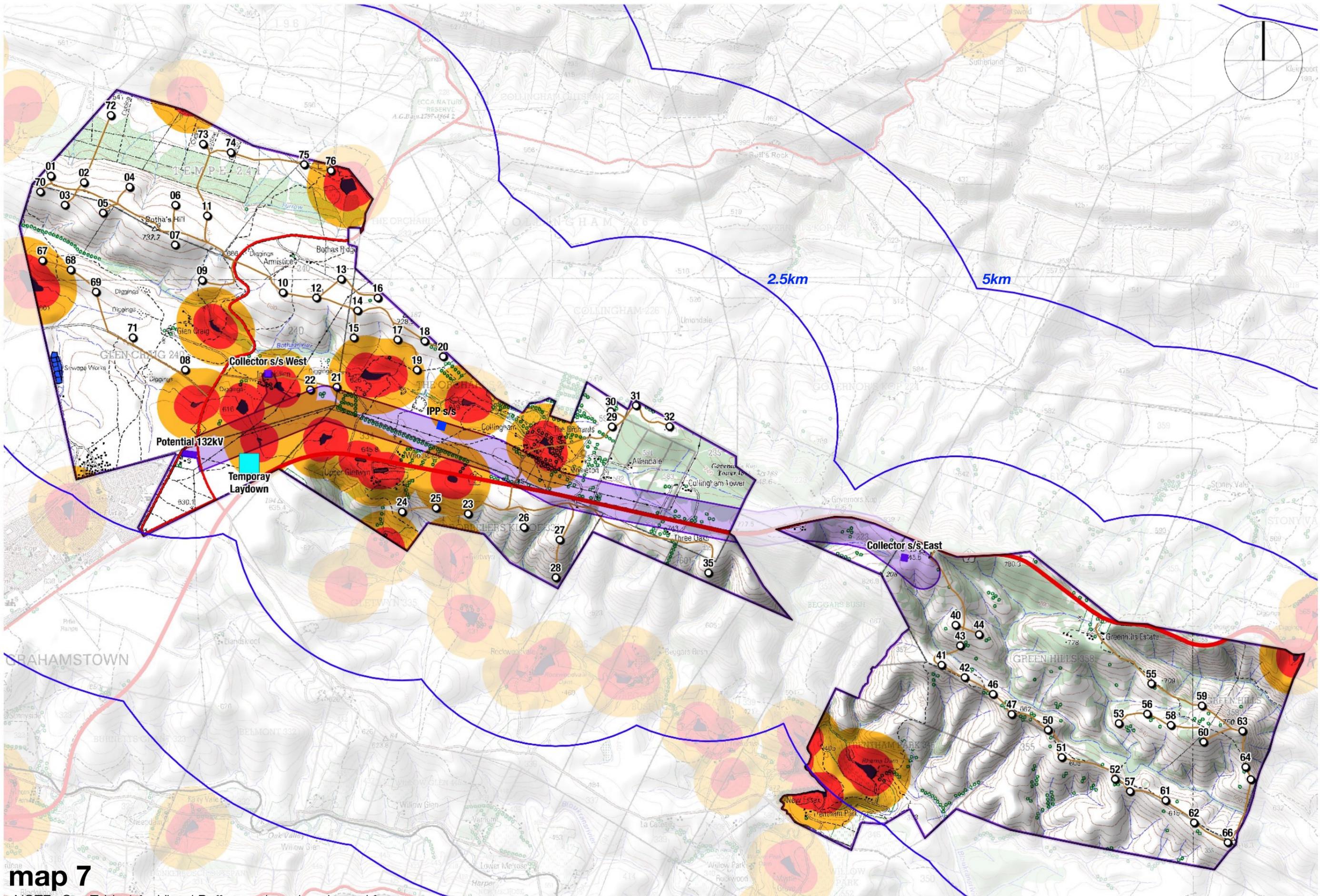


map 5

NOTE : See Table 1 for Visual Buffers and previous legend for sources

VISUAL SENSITIVITY : Topographic Features

base map : NGI 1:50 000 Topographic Series : 3326BA Fort Brown, BB Breakfast Vlei, BC Grahamstown, BD Trappe's Valley

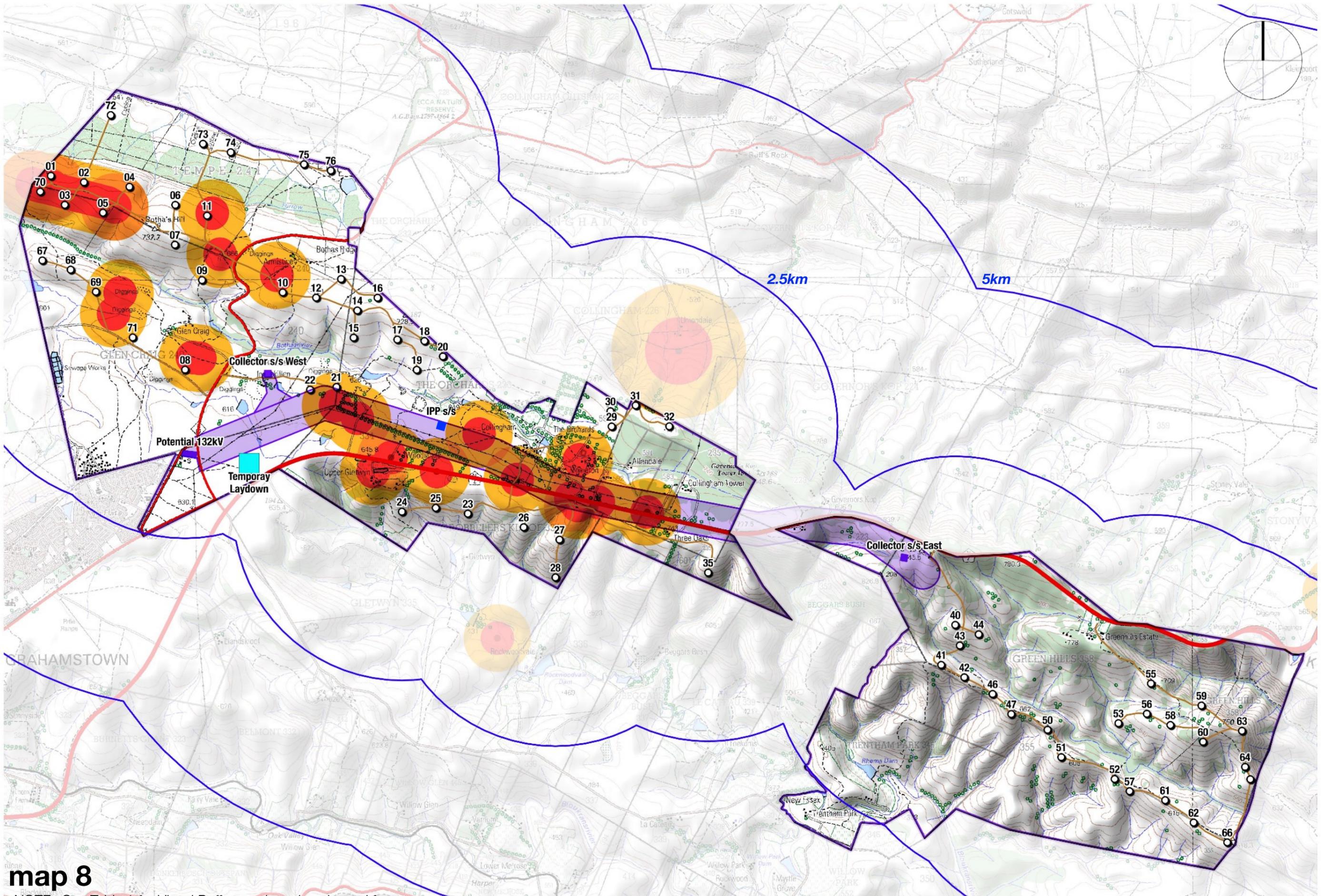


map 7

NOTE : See Table 1 for Visual Buffers and previous legend for sources

VISUAL SENSITIVITY : Water Features, Wetlands, Dams

base map : NGI 1:50 000 Topographic Series : 3326BA Fort Brown, BB Breakfast Vlei, BC Grahamstown, BD Trappe's Valley



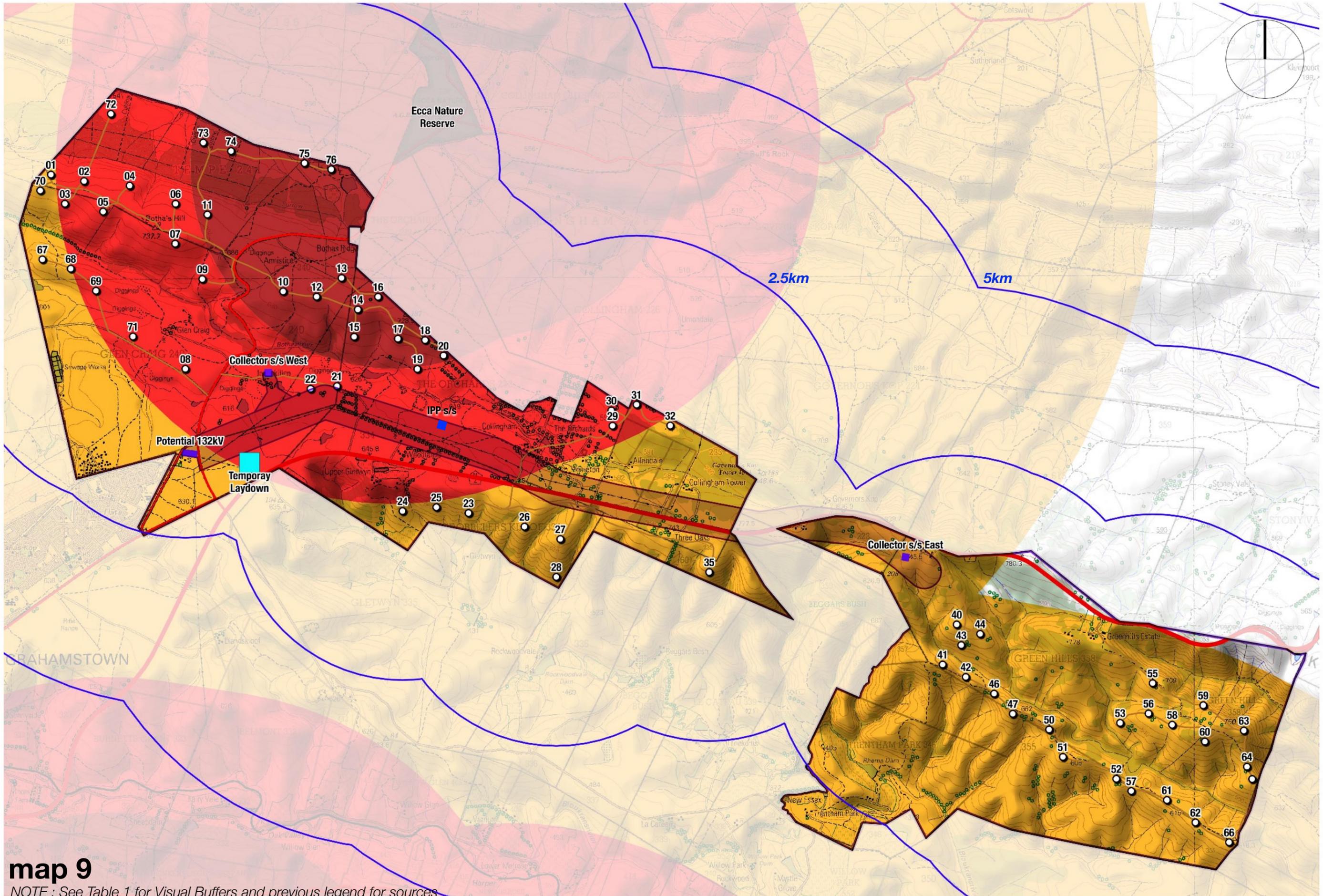
map 8

NOTE : See Table 1 for Visual Buffers and previous legend for sources

VISUAL SENSITIVITY : Heritage Sites Grades I, II & III

base map : NGI 1:50 000 Topographic Series : 3326BA Fort Brown, BB Breakfast Vlei, BC Grahamstown, BD Trappe's Valley



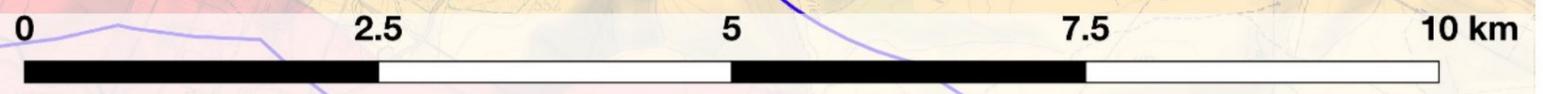


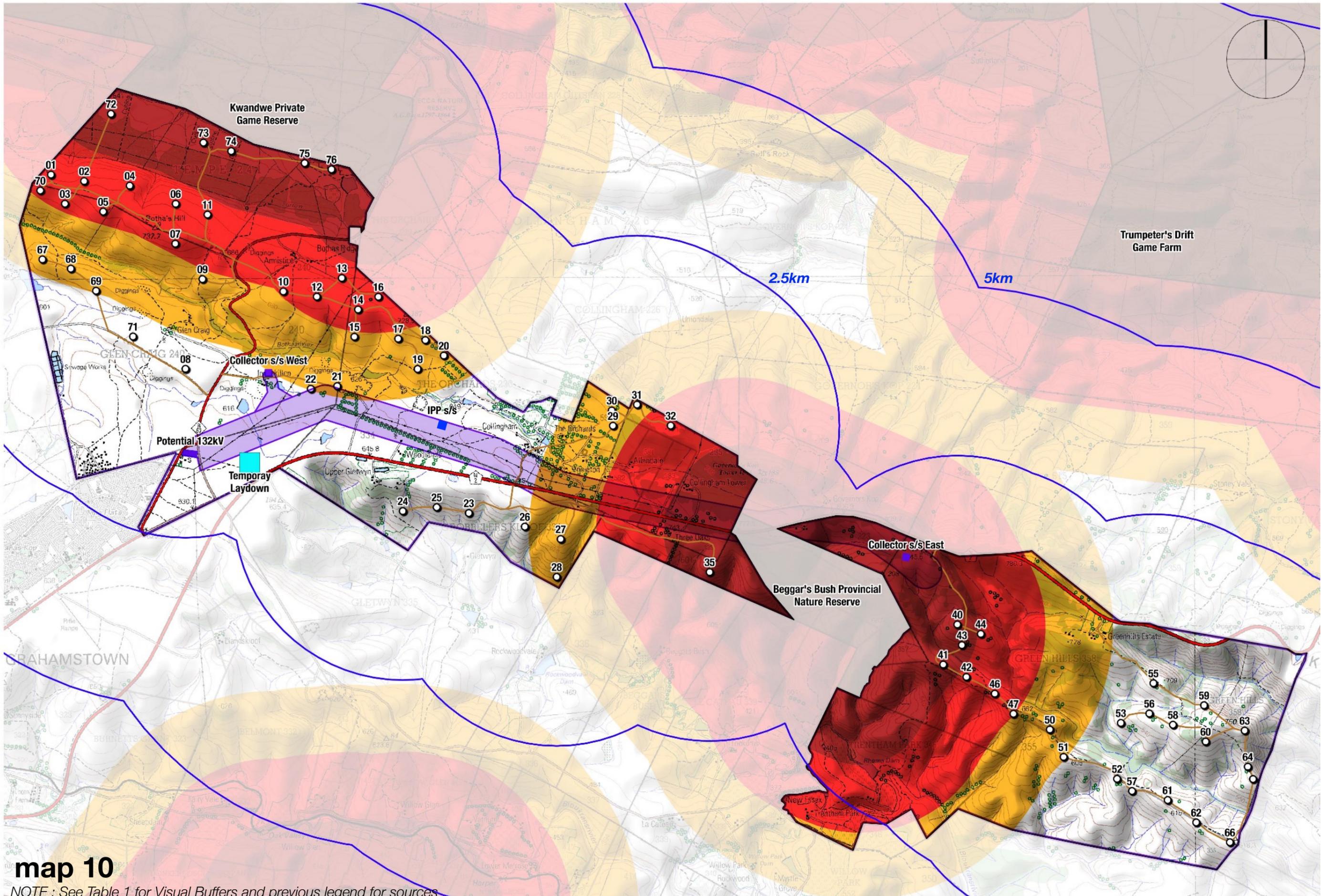
map 9

NOTE : See Table 1 for Visual Buffers and previous legend for sources

VISUAL SENSITIVITY : SAPAD Nature Reserves

base map : NGI 1:50 000 Topographic Series : 3326BA Fort Brown, BB Breakfast Vlei, BC Grahamstown, BD Trappe's Valley





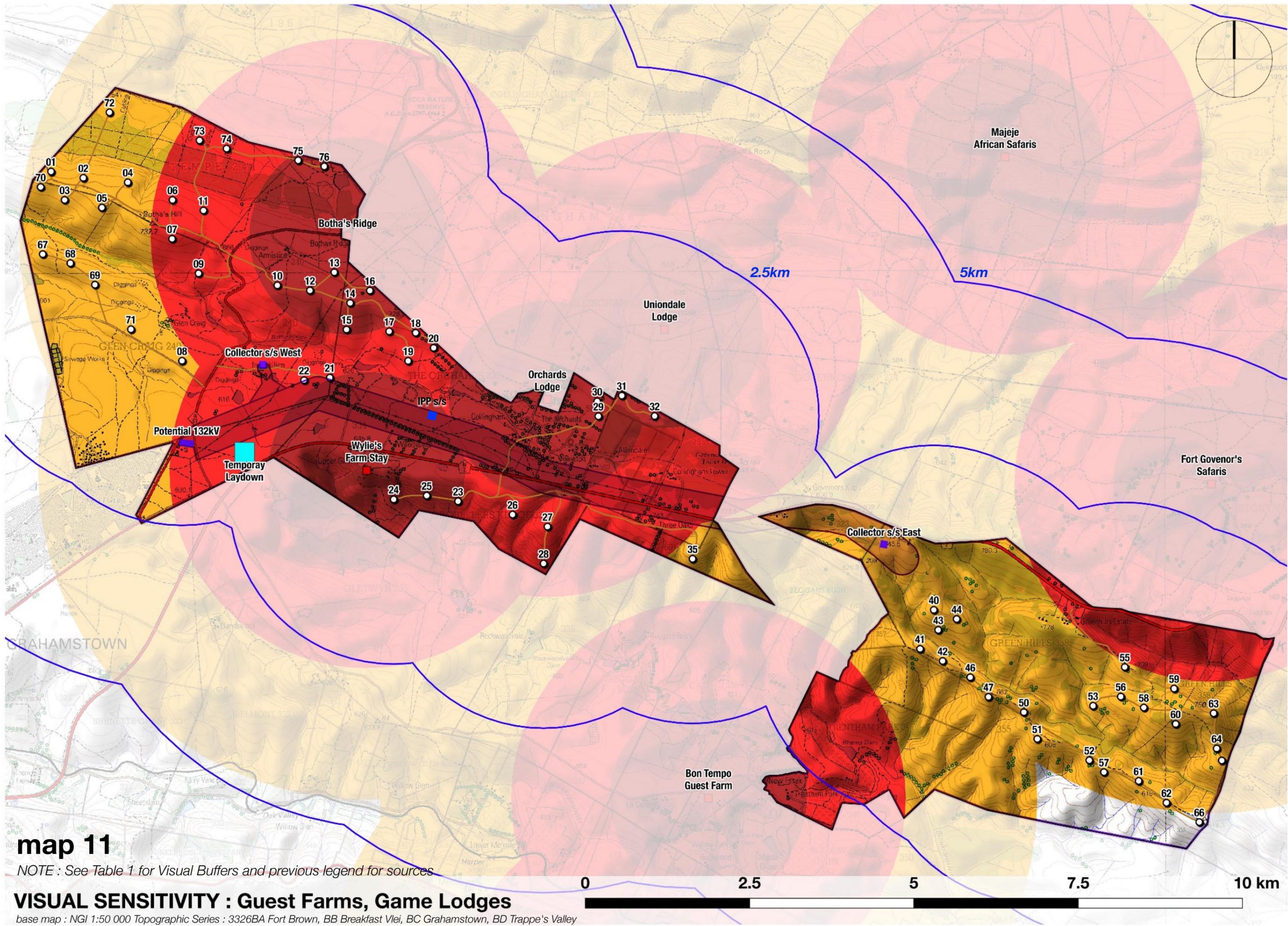
map 10

NOTE : See Table 1 for Visual Buffers and previous legend for sources

VISUAL SENSITIVITY : SANBI Provincial Reserves,

Game Farms

base map : NGI 1:50 000 Topographic Series : 3326BA Fort Brown, BB Breakfast Vlei, BC Grahamstown, BD Trappe's Valley

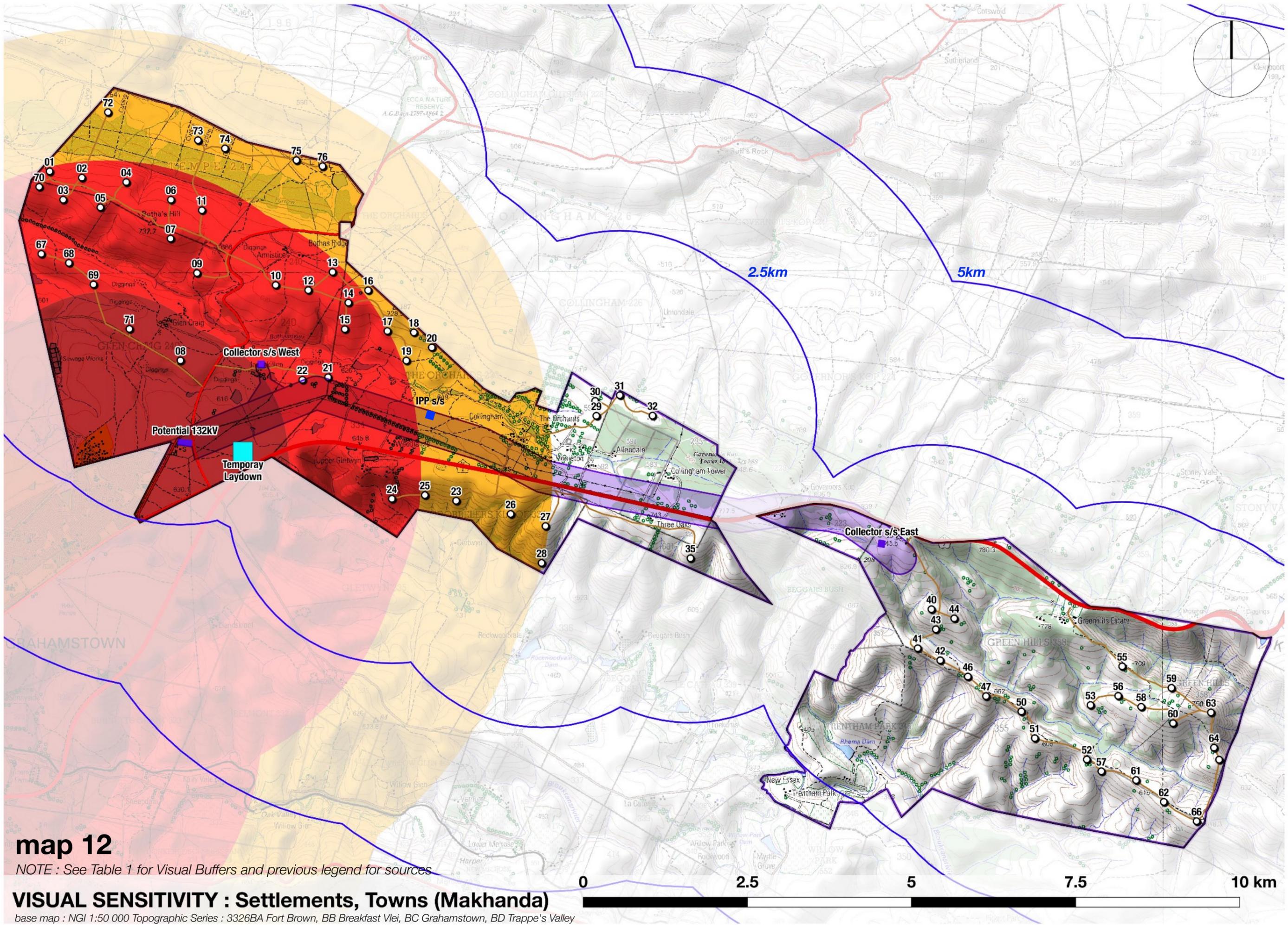


map 11

NOTE : See Table 1 for Visual Buffers and previous legend for sources

VISUAL SENSITIVITY : Guest Farms, Game Lodges

base map : NGI 1:50 000 Topographic Series : 3326BA Fort Brown, BB Breakfast Vlei, BC Grahamstown, BD Trappe's Valley

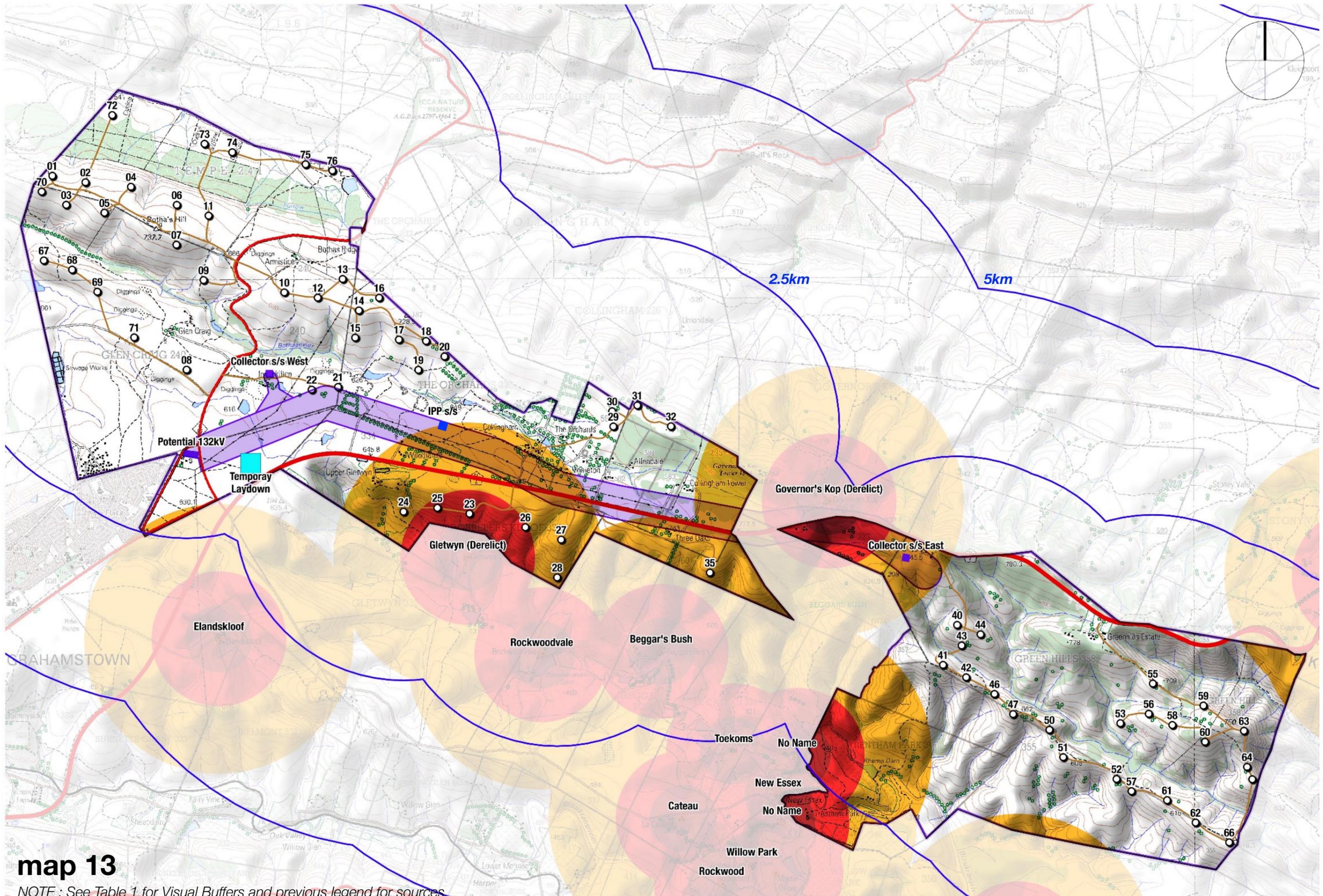


map 12

NOTE : See Table 1 for Visual Buffers and previous legend for sources

VISUAL SENSITIVITY : Settlements, Towns (Makhanda)

base map : NGI 1:50 000 Topographic Series : 3326BA Fort Brown, BB Breakfast Vlei, BC Grahamstown, BD Trappe's Valley

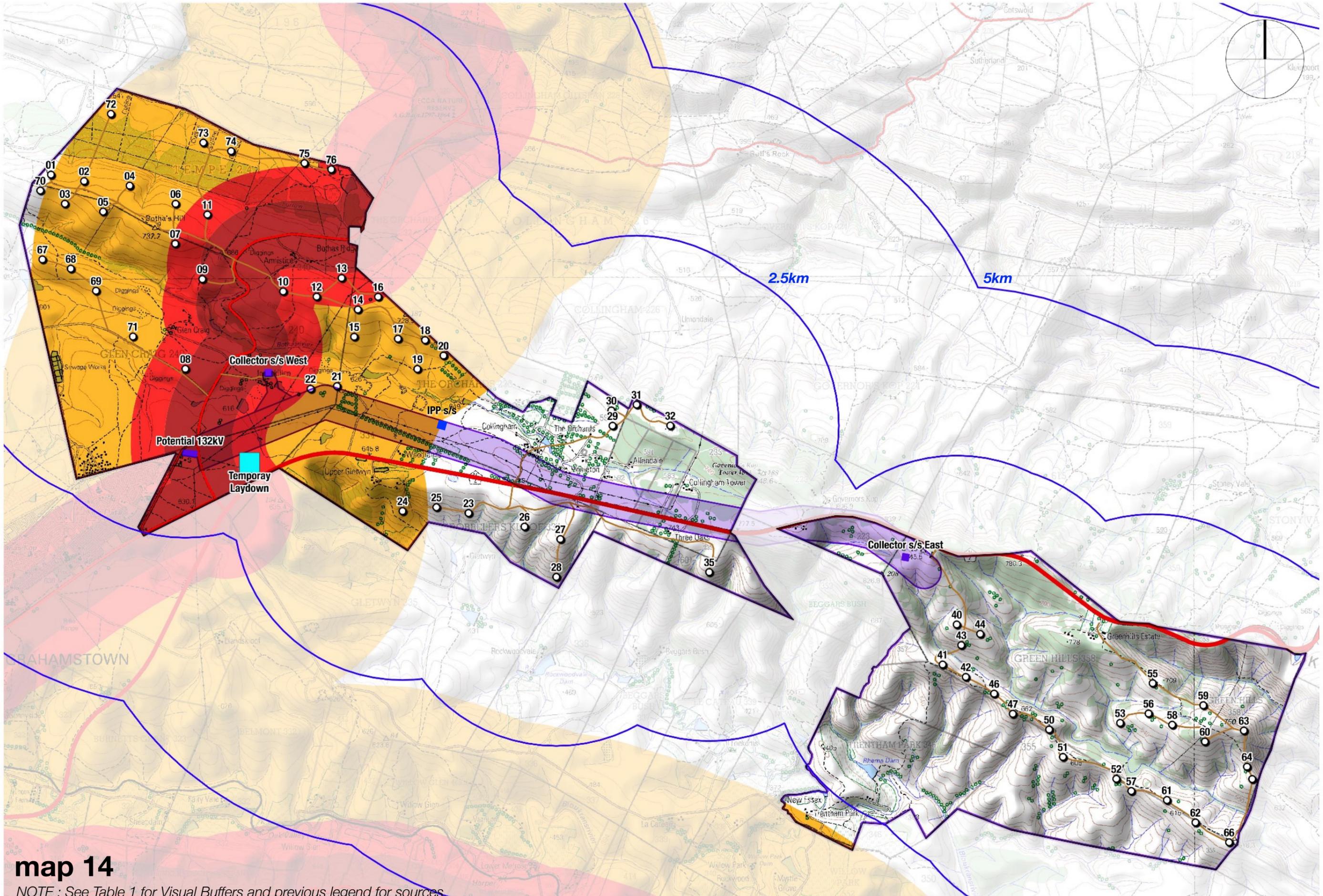


map 13

NOTE : See Table 1 for Visual Buffers and previous legend for sources

VISUAL SENSITIVITY : Farmsteads (OUTSIDE Site)

base map : NGI 1:50 000 Topographic Series : 3326BA Fort Brown, BB Breakfast Vlei, BC Grahamstown, BD Trappe's Valley

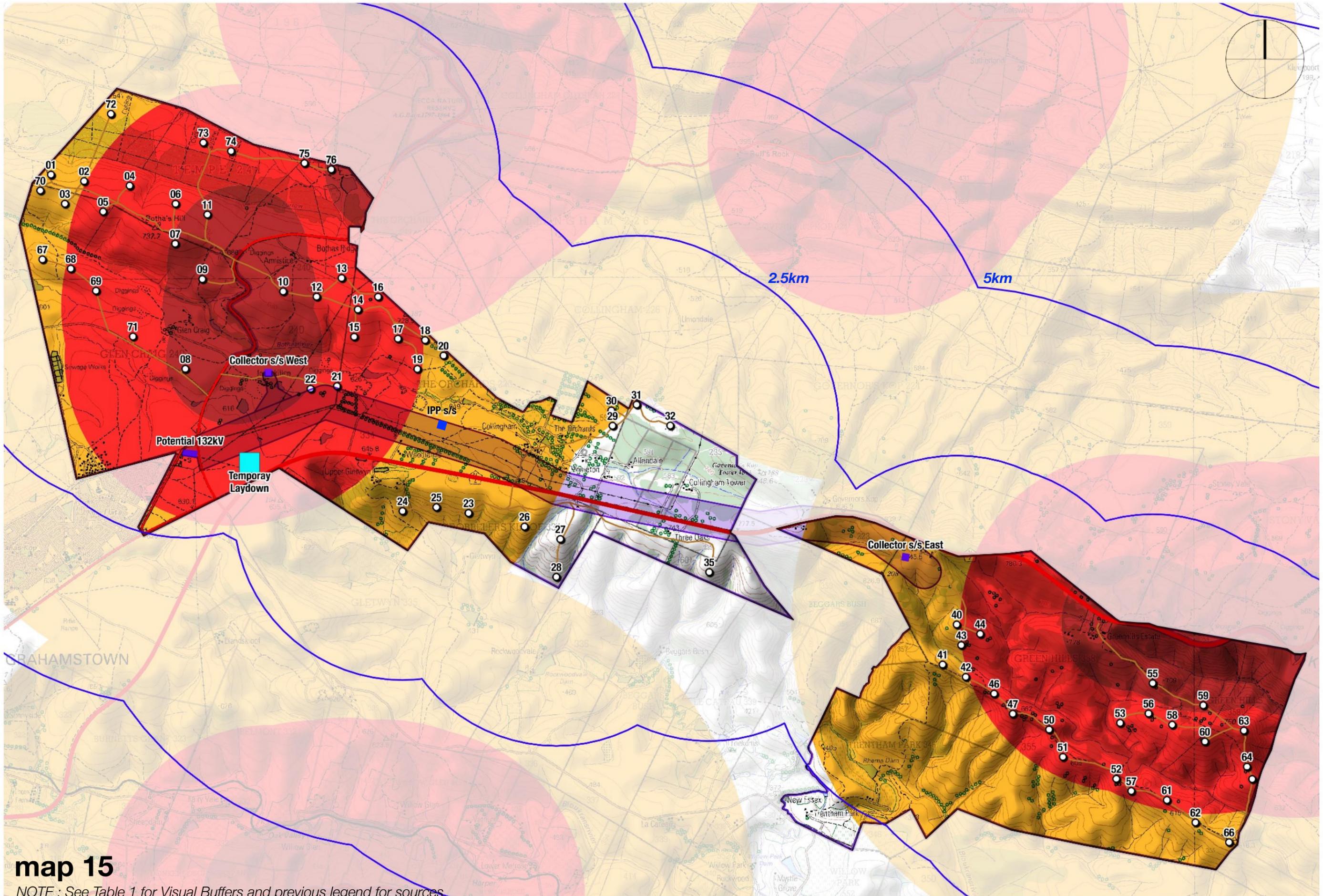


map 14

NOTE : See Table 1 for Visual Buffers and previous legend for sources

VISUAL SENSITIVITY : Provincial / Arterial Routes

base map : NGI 1:50 000 Topographic Series : 3326BA Fort Brown, BB Breakfast Vlei, BC Grahamstown, BD Trappe's Valley

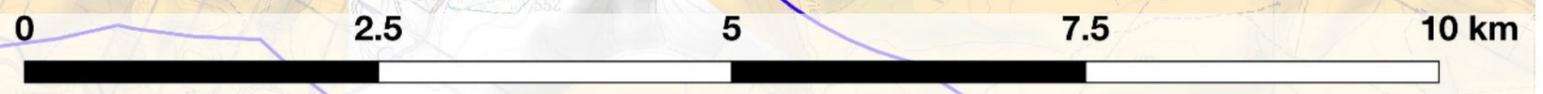


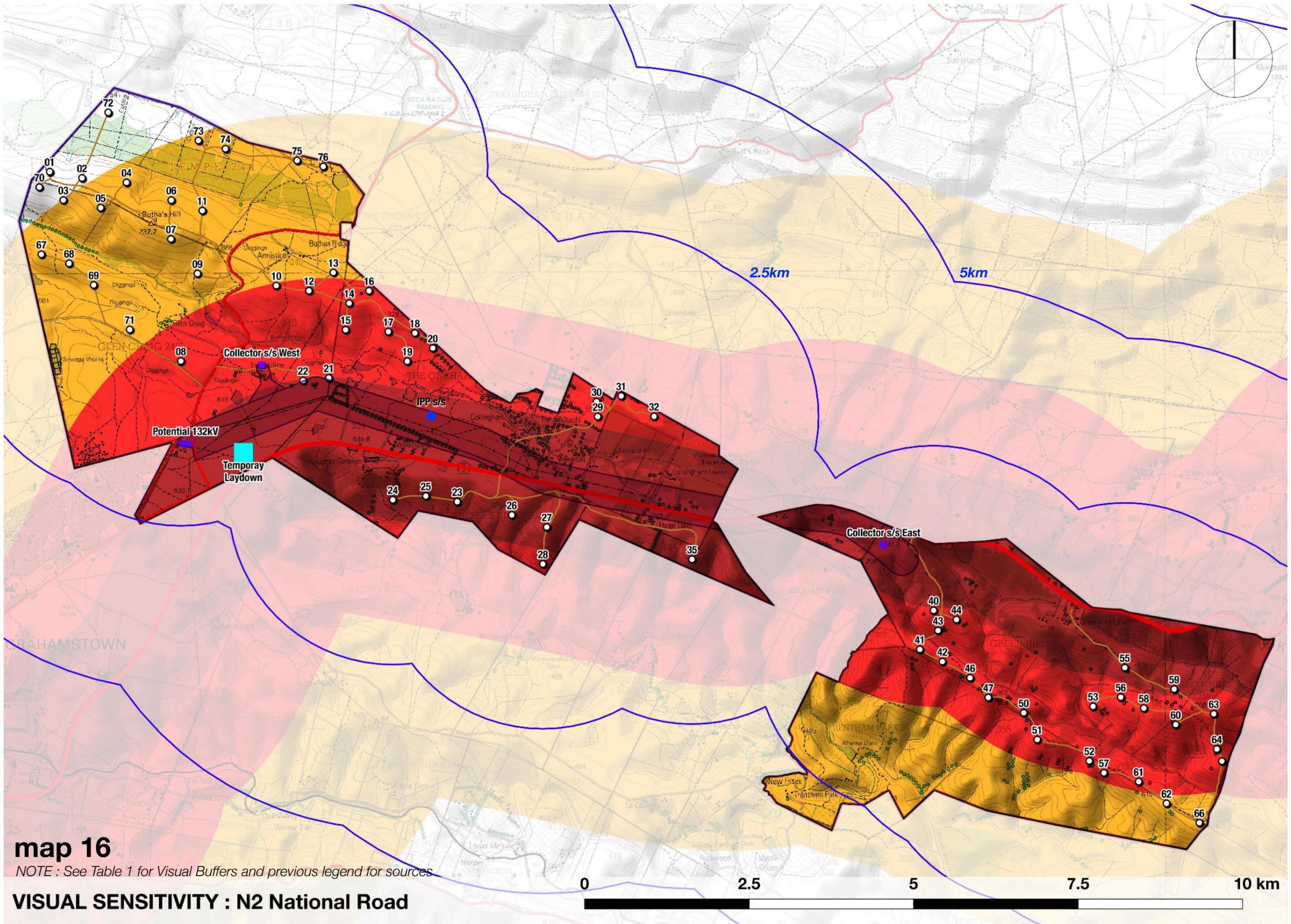
map 15

NOTE : See Table 1 for Visual Buffers and previous legend for sources

VISUAL SENSITIVITY : Scenic Routes

base map : NGI 1:50 000 Topographic Series : 3326BA Fort Brown, BB Breakfast Vlei, BC Grahamstown, BD Trappe's Valley



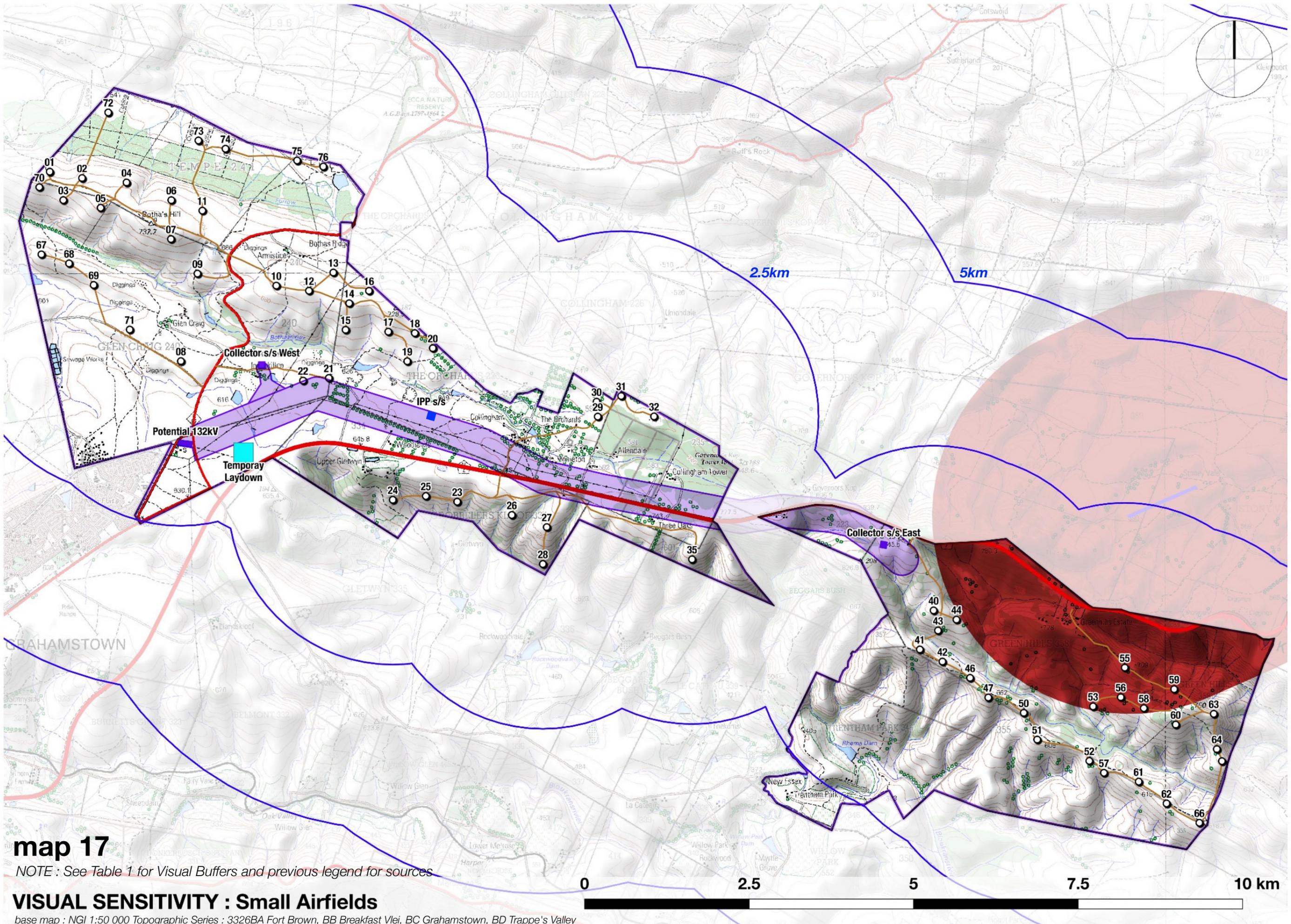


map 16

NOTE : See Table 1 for Visual Buffers and previous legend for sources

VISUAL SENSITIVITY : N2 National Road



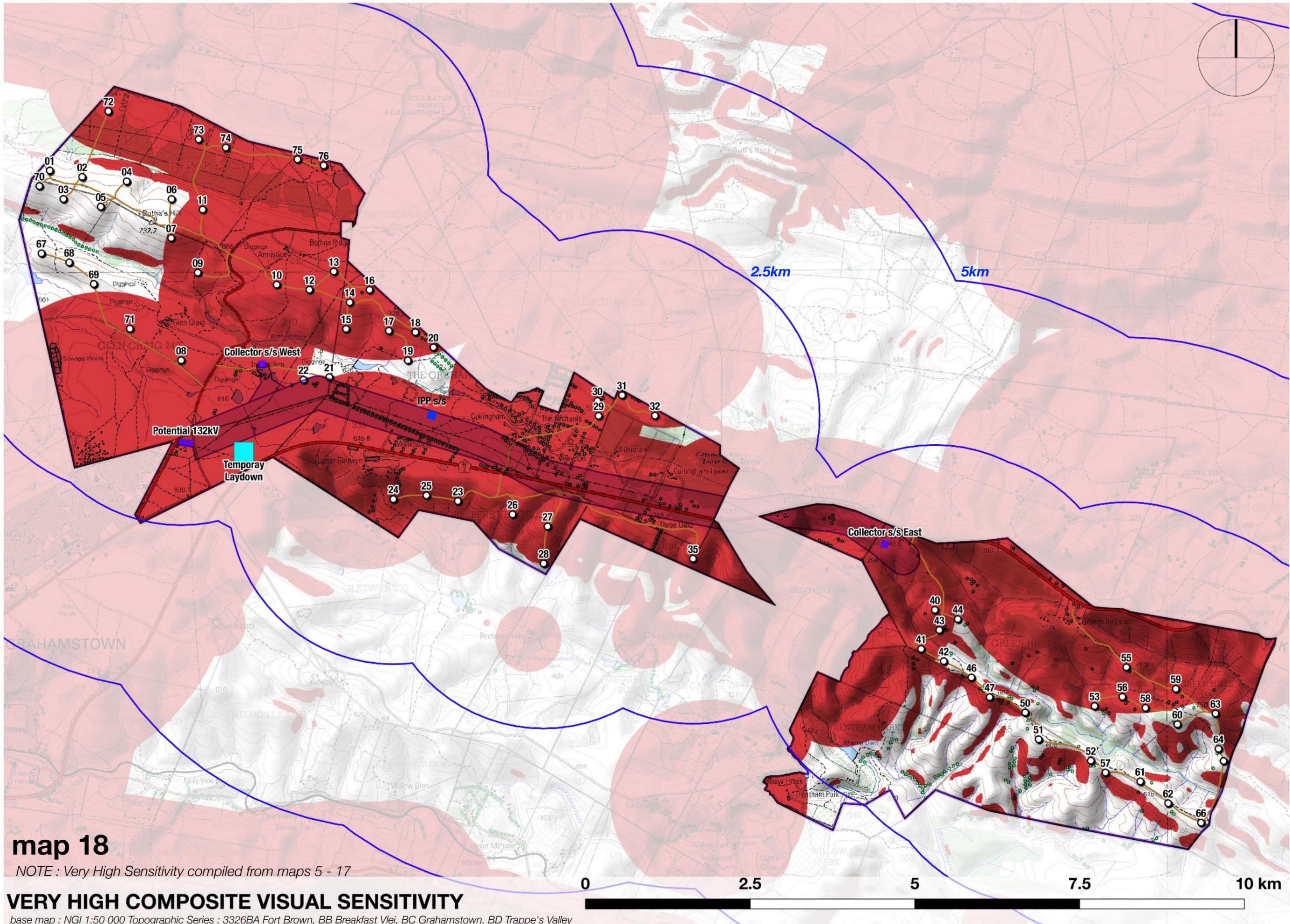


map 17

NOTE : See Table 1 for Visual Buffers and previous legend for sources

VISUAL SENSITIVITY : Small Airfields

base map : NGI 1:50 000 Topographic Series : 3326BA Fort Brown, BB Breakfast Vlei, BC Grahamstown, BD Trappe's Valley



map 18

NOTE : Very High Sensitivity compiled from maps 5 - 17

VERY HIGH COMPOSITE VISUAL SENSITIVITY

base map : NG1 1:50 000 Topographic Series : 3326BA Fort Brown, BB Breakfast Vlei, BC Grahamstown, BD Trappe's Valley

EXTERNAL REVIEW DRAFT ENVIRONMENTAL IMPACT ASSESSMENT (EIA) REPORT

ALBANY WIND ENERGY FACILITY
DEA Reference Number: 14/12/16/3/3/2/1131

May 2020

Prepared by



GLOBAL GREEN

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EXECUTIVE SUMMARY

Global Green Environmental Consultants in association with the Environmental Assessment Research Group (EARG) from the North West University (NWU - Potchefstroom campus) was appointed by Richard Summers Inc. to conduct an external review of the Draft Environmental Impact Assessment (EIA) Report for the Albany Wind Energy Facility (DEA Reference Number: 14/12/16/3/3/2/1131). The review was conducted by two reviewers according to the NWU EIA Report Quality Review Package to determine the extent to which the report complies with minimum legal requirements and thereby serves to support reasonable decision making by the competent authority.

Overall the report achieved an 'E' rating which means that as a whole the content is not satisfactory with the following significant omissions or inadequacies. Moreover, it means that the content cannot support reasonable decision making (that is rational and proportional) by the competent authority as required by the relevant legislation:

- *Methodology:* The assessment methodology is lacking in key respects, especially in relation to significance and mitigation. The significance method and criteria are poorly explained and inconsistently applied. The mitigation methodology failed to apply the mitigation hierarchy and subsequently certain reasonable mitigation options (such as avoidance) were overlooked.
- *Rationality:* Due to the weaknesses in methodology the rationality behind the significance ratings and mitigation options were unclear and incoherent.
- *Key issues:* The report failed to deal with what seems to be the most significant potential impact of the WEF raised by IAPs, namely on surrounding eco-tourism enterprises. This is a fatal flaw in the Draft EIA Report.

We trust that you find the report in order and thank you for the opportunity to contribute. If there are any uncertainties or additional information required, please feel free to contact either of the undersigned.



Prof Francois Relief

Lead Reviewer
25-05-2020



Me Charlotte Cilliers

2nd Reviewer
25-05-2020

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DOCUMENT CONTROL			
Project	Albany Wind Energy Project – External Review		
GG reference ID	RS-18/04/2020	Client	Richard Summers Inc.
Lead reviewer	Prof Francois P Retief Tel: +27 83 639 2293	Client Contact	Mr Richard Summers Tel: +27 82 534 0328
2nd Reviewer	Me Charlotte Cilliers Tel: +27 72 573 8962	Documents Reviewed	Draft EIA Report <i>DEA Ref: 14/12/16/3/3/2/1131</i>
Date of the Review	11-15 May 2020	Reviewed against	NEMA, EIA Regulations 2014 (as amended 2017)

1. INTRODUCTION AND BRIEF

Global Green Environmental Consultants was appointed by Richard Summers Inc. as external reviewer for the Albany Wind Energy Facility (WEF) Draft EIA report (dated March 2020). The external report review was conducted in collaboration with the Environmental Assessment Research Group (EARG) of the North West University (NWU). We confirm that Global Green and NWU act independently and has no vested interest in the development project under review. External review and specifically report quality review is a particular focus of Global Green and the EARG. The lead reviewer has been co-author of various EIA review reports as well as subsequent peer reviewed papers that include report quality reviews between different South African EIA regimes (Retief et al, 2011; Sandham et al, 2012; Kidd et al, 2018); report quality related to specific industries such as mining (Sandham et al, 2008a) and manufacturing (Sandham et al, 2013), as well as report quality related to specific sectors such as water management (Sandham et al 2008b), biodiversity and conservation (Hallat et al, 2015; Swanepoel et al, 2019; Sandham et al, 2020), biological control (Sandham et al, 2010), etc. More recently a paper was also published on the conceptualization of EIA quality internationally (Bond et al, 2018).

As an introduction to the review this section briefly introduces the agreed scope of work as well as the individual reviewers involved, namely: Prof Francois Retief and Me Charlotte Cilliers.

1.1 SCOPE OF WORK – REVIEW OF DRAFT EIA REPORT

The overall scope of work is specified in a review proposal dated 16 April 2020, and requires the following:

Scope of work:

1. To conduct an independent external review of the quality of the Draft EIA Report for the Albany WEF against relevant South African legal requirements.
2. To consider the content of related reports such as the Final Scoping Report as well as relevant specialist reports in as far as their content informs the Draft EIA Report quality and requirements. In particular, this refers to the Plan of Study included in the Final Scoping Report as well as those specialist studies related to key environmental issues and impacts.

1.2 REVIEWERS

The following two independent reviewers conducted the external review (see Annexure A for CV summaries):

- Prof Francois Retief – NWU and Global Green
- Me Charlotte Cilliers – Global Green

2. EXTERNAL REVIEW METHODOLOGY

Various international packages and guidelines have been developed for EIA report quality review. The Lee-Colley package (Lee and Colley, 1992) is probably the most well-known and widely adapted and applied internationally. In terms of South Africa, significant progress has been made to adapt international report review packages to the local context. The review package used for this review is a version of the so-called 'NWU Report Quality Review Package' which has been adapted from the Lee-Colley package and is continually updated as local policy and legislation changes. The most recent version of the package reflects the 2014 EIA Regulations and subsequent 2017 amendments. Different versions of the 'NWU Report Quality Review Package' has been successfully applied to EIA quality review over the years – the results of which have been published in various reports and peer reviewed journals as highlighted in section 1.

The review criteria applied under section 3.2 and summarised in Table 3.2 deal specifically with South African legal requirements for the Draft EIA report. It is important to stress that these criteria should not be considered best practice criteria because frankly the South African EIA system does not reflect international best practice. This review merely considers the report content against what the law requires in South Africa, also acknowledging that legal interpretation of some requirements might vary. Ultimately according to South African law the content of the EIA Report must support the relevant authority to make a 'reasonable' decision that is 'rational' and 'proportional' (see Alberts et al, 2020; Retief et al, 2020)

2.1. CONTENT OF THE REVIEW PACKAGE

The NWU Report Quality Review Package is designed as a self-contained package with the following components:

- a list of criteria (grouped under Review Areas) to be used in each report review.
- an evaluation sheet/table on which to record the findings from applying the criteria.

The criteria should reflect the South African EIA System legal requirements and, as far as possible, satisfy the following requirements:

- each should be well defined and unambiguous;
- each should be capable of reasonably consistent and objective application;
- each should serve a distinct purpose different from the purposes of other criteria;
- each should be considered sufficiently important to merit influencing the ultimate assessment of report quality;
- the number of criteria should be as few as possible, consistent with covering all topics identified as essential (judged, in this instance, by reference to the South African legislative minimum requirements).

2.2 APPLYING THE REVIEW PACKAGE

EIA reports should be reviewed independently by at least two reviewers and any differences in the review results should be systematically examined by them to see whether they can be resolved. As already indicated in section 1.2, two reviewers took part in this particular review. The evaluation resulting from applying each criterion is recorded by the reviewers on the evaluation table using a standard list of assessment symbols as described in Table 2.1. ‘Letters’ rather than ‘numbers’ are used as symbols to discourage reviewers from crude aggregation. The evaluation table should not only be used to record the chosen assessment symbols, but also to record, in a brief summary, the principal justification for the evaluation score. This discourages ‘over-mechanical’ reviews.

Table 2.1. List of evaluation symbols

Symbol	Explanation	Implications for decision making
A	Relevant tasks well-performed, no important tasks left incomplete.	These ratings (A-C) mean that the quality of the report content complies with minimum legal requirements and is sufficient to allow the competent authority to make a reasonable decision (that is rational and proportional) in line with the requirements of the Promotion of Administrative Justice Act (PAJA – Act 3 of 2000).
B	Generally satisfactory and complete, only minor omissions and inadequacies.	
C	Can be considered just satisfactory despite omissions and/or inadequacies.	
D	Parts are well attempted but must, as a whole, be considered just unsatisfactory because of omissions or inadequacies.	These ratings (D-F) mean that the quality of the report content does not comply with minimum legal requirements and is insufficient to allow the competent authority to make a reasonable decision (that is rational and proportional) in line with the requirements of the Promotion of Administrative Justice Act (PAJA – Act 3 of 2000).
E	Not satisfactory, significant omissions or inadequacies.	
F	Very unsatisfactory, important task(s) poorly done or not attempted.	
NA	Not applicable. The Review Topic is not applicable, or it is irrelevant in the context of this Statement.	

The current version of NWU Report Quality Review Package has been extensively tested. The results show a meaningful level of agreement in the assessments made by different reviewers of the same report. The Draft EIA report was evaluated against review areas and criteria derived from GNR 982 and specifically Regulation 23 as well as Appendix 3, which describes the purpose and content requirements. The ultimate aim of the review was to determine to what extent the report provide sufficient information for decision making and if the report complies with minimum legal requirements.

3. REVIEW RESULTS

This section deals with results of the external review for the Albany WEF Draft EIA Report. In line with the methodology described in the previous section the results are presented as ‘main results’ in relation to the different Review Areas (section 3.1) and ‘detailed results’ in terms of the different Review Criteria (section 3.2).

3.1 MAIN RESULTS

Table 3.1 provides a summary of the main review results per Review Area. Based on the results it is concluded that the overall report achieves an ‘E’ rating which means that as a whole the content is not satisfactory with significant omissions or inadequacies. Moreover, it means that the content cannot support reasonable decision making (that is rational and proportional) by the competent authority as required by the relevant legislation.

Table 3.1: Summary of main review results for the Draft EIA Report

SUMMARY OF REVIEW AREAS		A	B	C	D	E	F
1	General Aspects				X		
2	Conformance to the Plan of Study					X	
3	Determining Significance					X	
4	Public Participation		X				
5	Dealing with Mitigation					X	
FINAL RATING						X	

3.1.1 Review Area 1: General Aspects

The review results for Review Area 1: General Aspects produced an overall 'D' rating (*"Parts are well attempted but must, as a whole, be considered just unsatisfactory because of omissions or inadequacies"*). We base this rating on the following findings:

- **Consideration of Guidelines:** EIAs must have regard for any guideline published in terms of section 24J of NEMA and any minimum information requirements. This includes the updated 2017 *Need and Desirability Guideline* which has seemingly not been consulted. The Guideline sets out a list of questions which should be addressed when considering need and desirability of a proposed development. These are divided into questions that relate to ecological sustainability and justifiable economic and social development. None of those questions has been directly and expressly addressed. When considering how the development may affect or promote justifiable economic and social development, the relevant spatial plans must be considered, including local municipal IDPs and SDFs which has not been done in the EIR. The failure to address correctly the enquiry into need and desirability is a particular weakness of the EIA Report.
- **Scope of the assessment:** The Draft EIA Report excludes the substations and transmission line from the project description and project footprint calculation. We could not determine from the report exactly why this is, except for reference to the fact that Eskom will provide this infrastructure and therefore are responsible for these authorisations. However, irrespective of who is responsible for the infrastructure, the assessment of the WEF is incomplete without including the substations and transmission line. The reason for this is because whatever is approved in terms of the WEF will essentially predetermine and lock in the location of the substations and delineation of the transmission line. The specialist studies did seem to include the substations and transmission line in their project descriptions and therefore it is assumed in their assessment as well. We did find that the avifauna assessments did indeed consider the transmission line while other specialist studies such as the visual assessment did not. So there are inconsistency in the scope of the assessment and the project descriptions between different reports. The implication of this inconsistency in the project scope is that the outcome of the assessment as a whole could be questioned.
- **Inconsistency in project description:** The project description changed from the BID to the Scoping Report to the EIA Report. It is not clear if these changes are the result of the outcome of the assessment or what the rationale for these changes is. As already mentioned certain infrastructure, i.e. substations and transmission lines are excluded from the EIA Report. The turbine capacity changed from 4,5MW in the BID to 6MW in the

Scoping Report, and between 4 and 8 MW in certain specialist reports, etc. Moreover, reference is made to a 90 turbine layout in the EIA Report which is not provided anywhere in the report itself.

3.1.2 Review Area 2: Conformance to the Plan of Study

The review results for Review Area 2: Conformance to Plan of Study suggest an overall 'E' rating (*“Not satisfactory, significant omissions or inadequacies”*). Based on a comparison of the Plan of Study with the Draft EIA Report we highlight the following:

- **Alternatives to be assessed:** No indication is given in the Plan of Study of which alternatives (or project description) will be assessed in the EIA or by the specialists. Page 96 of the Draft EIA Report refers to a 90 turbine layout provided to the specialists to be assessed. Yet looking at the specialist reports they only considered the 66 turbine preferred alternative. So overall it was difficult to follow the logic how the EIA and specialist assessments considered the 90 turbine alternative (or any alternative for that matter) and then came up with the 66 turbine alternative. At the moment it seems as if the 66 turbine alternative was first decided and then the specialists merely assessed the already preferred alternative which does not make sense – because this might infer that the outcome was predetermined and therefore the EIA does not comply with Section 24O of NEMA.
- **Key issues not addressed:** The conformance of the specialist studies with the TOR described in the Plan of Study was not reviewed in detail. We rather focussed on the key issues raised by IAPs and to what extent they were addressed. The following are examples of important key issue not addressed in the Draft EIA Report:
 - The visual and socio-economic impact of the proposed WEF on sensitive visual receptors (game farms and nature reserves) and tourism in the area. The commitment was made in the Scoping Report to various IAPs that the visual and socio-economic impacts of the WEF on each affected landowner will be assessed. We could not find evidence that this was done – the outcome of the Draft EIA Report on this issue is inconclusive and speculative at best (also see Review Area 3). Therefore, the issue is unresolved.
 - The impact of the WEF on land values was also explicitly raised by IAPs. In response, the socio-economic study acknowledged this issue but considered it outside of its scope – and rather recommended that it should be investigated and rated separately by a Land Valuer / Economist. This was not done.
 - Social impacts related to the decommissioning phase was not addressed. The environmental authority surely needs to have a clear understanding of the socio-

economic impacts should the facility be decommissioned. This is a critical consideration in the context of need and desirability which is not addressed.

3.1.3 Review Area 3: Determining Significance

The review results suggest an overall 'E' rating ("*Not satisfactory, significant omissions or inadequacies*") for Review Area 3: Determining Significance. Significance determination lies at the heart of EIA and relies on a clear methodological description and consistency in the application of the method and line of argumentation. We highlight the following key weaknesses of the Draft EIA report:

- **Weak methodological design and description:** The Final Scoping and/or Draft EIA Report do not explain how significance will be determined – it merely defines different criteria with no explanation of how the criteria relate or how they should be weighed towards a significance rating. This is important because significance is in many instances a subjective value judgement which relies on a systematic and clearly described method. However, subjective does not mean arbitrary. This lack of a clear and systematic method manifests in inconsistencies in argumentation. Examples, from Appendix C1 are:
 - Direct impacts from dust nuisance is rated *localised, short term, probable, moderate = low significance (before mitigation)* while water quality direct impacts with exactly the same ratings = *moderate significance*.
 - The cumulative impacts for dust nuisance (before mitigation) rates *localised, short term, possible, moderate = moderate significance* while cumulative impacts related to infilling of a water course with exactly the same ratings = *low significance*.
- **Inconsistencies in the application of significance criteria:** The evaluation criteria presented in Table 10.1 in the Final Scoping Report is inconsistently applied in section 9 and Appendix C of the EIA Report. This brings into question the rationale as well as accuracy of the significance ratings. For example:
 - Table 10.1 refers to 'consequence' which is not dealt with in Appendix C;
 - The ranking terminology differs between Table 10.1 and Appendix C, i.e. extent uses *localized, moderate* and *extensive* while Appendix C refers to *localised, regional, national*;
 - Mitigation refers to *low, moderate, high, very high* while Annex C merely refers to *easy*.
- **Incoherent argumentation:** It was at times difficult to follow the rationale underpinning the significance ratings. For brevity sake we only use the example of what is probably the most significant issue raised during the scoping phase, namely the socio-economic impacts of the WEF on eco-tourism in the area.

- The results of the socio-economic specialist report translated into the significance ratings in the EIA Report suggest that the WEF will have a “*low significance*” positive impact in terms of both ‘new employment’ as well as ‘impact on local economy’ - while a “*moderate significance*” negative impact in terms of ‘loss of existing employment’ and ‘local economic impact’. So why would the competent authority support a development that will seemingly have a “low” economic benefit and a “moderate” negative economic impact? It makes no sense. Such a development should on the face of it not be supported.
- The visual impact assessment concluded a “*high significance*” impact on visual sensitive receptors (direct and cumulative impacts) and “*moderate significance*” rating for impact of night lights before and after mitigation. However, it seems that the mitigation hierarchy was not applied because if avoidance would be considered the impact after mitigation could be low. However, no indication could be found that avoidance was considered. It further stems to reason that with a minimum of 35 turbines required to make the development viable, ample scope exists to apply avoidance as a mitigation option to the 66 turbine preferred alternative. Moreover, it is explicitly stated in the Draft EIA Report (p110 and 186) that as far as possible turbines should not be erected in direct view of lodges and strategic viewpoints at the game reserves – if this avoidance option is applied then the “*high significant*” impact on visual sensitive receptors after mitigation would reasonably be reduced to “*low significance*”.
- **False and unsubstantiated claims:** The content of any EIA Report is rarely 100% conclusive and EAPs and specialists work with information that is reasonably available and obtainable within the resources and time available. Therefore, we fully recognise these limitations and are careful not to be unreasonable in our expectations. However, in this case we did identify what we consider to be false and unsubstantiated claims in relation to certain key issues and impacts, in particular in relation to the impact of the WEF on the eco-tourism industry. The conclusions reached and described in both the socio-economic specialist report as well as in the EIA Report is highly questionable. Because of the high level of importance that this particular issue enjoys in relation to this WEF (raised by numerous IAPs during the Scoping Phase) we consider it necessary to elaborate. We refer in particular to the following concluding statements (p110):
 - “*Tourism in the study area is associated with the “Africa and bush experience” and the tourism landscape thus differs from studies done in Europe, UK and USA. Parallels can however still be drawn and it is the opinion of the SIA Specialist that research results can safely be used for this study*”. It is not clear what ‘safely’ refers to but it is correct that international studies on the impact of WEF on tourism could and should be